

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES ALEX
FIELDS, JR., VANGUARD AMERICA,
ANDREW ANGLIN, MOONBASE
HOLDINGS, LLC, ROBERT “AZZMADOR”
RAY, NATHAN DAMIGO, ELLIOTT
KLINE a/k/a ELI MOSELEY, IDENTITY
EVROPA, MATTHEW HEIMBACH, MATTHEW
PARROTT a/k/a DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-KNIGHTS,
MICHAEL “ENOC” PEINOVICH, LOYAL
WHITE KNIGHTS OF THE KU KLUX KLAN,
and EAST COAST KNIGHTS OF THE KU KLUX
KLAN a/k/a EAST COAST KNIGHTS OF THE
TRUE INVISIBLE EMPIRE,

Defendants.

DEFENDANT FIELDS’ ANSWERS TO PLAINTIFFS’ FIRST INTERROGATORIES

COMES NOW Defendant JAMES ALEX FIELDS, JR. (“Fields”), by counsel, and for his

Answers to Plaintiffs’ First Interrogatories, states as follows:

1. Identify all means of communication used by you to communicate concerning the Events, whether before, during, or after the Events, and for each means of communication, identify all names, aliases, e-mail addresses, phone numbers, and Social medial Handles you used in connection with such communications, including the 18-digit account identifier associated with any discord account used by You. Means of communication include, but are not limited to, telephone calls, in-person meetings, and all means of electronic communication including, for example, Social media, email, SMS messages, podcasts, and online video.

ANSWER: Fields states that he told his mother through in-person conversation, via telephone calls, and text messages, that he planned to travel to Charlottesville for the August 12 rally. Fields did not knowingly send, receive, or participate in the exchange of any letters, emails, text messages, instant messages, direct messages, telephone conversations, voicemail messages, face-to-face meetings, electronic chats, podcasts, or online videos about the August 12 rally or any other topics with any of the co-defendants listed in the Amended Complaint. Fields states that he likely read, liked, and retweeted or reposted posts on Twitter and Facebook, and on other social media accounts concerning the August 12 rally. The electronic devices which Fields would have used to access his Twitter and social media accounts are presently in the possession of law enforcement. The relevant Twitter account that Fields would have used is @TheNewGiantDad. His facebook account had a username james.fields.9279 and a display name "Conscious Ovis Aries." His cellular phone number is 804.414.9660.

2. Identify any "channel" or "server" on Discord to which you had access.

ANSWER: Fields does not have access to his social media accounts to ensure an accurate

response. To the best of his recollection, Fields states generally that he recalls creating a Discord account at some time in 2017 when co-workers invited him to join a channel related to the video game Ark Survival Evolved. Fields does not recall actually joining this channel or server, or any other channel or server, or ever communicating through Discord, after he created his Discord account. Fields certainly never communicated about the August 12 Rally or “the Events” through Discord.

3. Identify all persons (natural or non-natural) with whom you communicated concerning the events, whether before, during, or after the Events.

ANSWER: Objection on the grounds this Interrogatory is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence and might be interpreted as an attempt to violate attorney-client privilege. Subject to and without waiving this objection, Fields states that he communicated with his mother, Samantha Bloom, about his plan to attend the August 12 Rally. He also generally communicated with his supervisor to request time off from work to attend the rally but did not provide specific information about the August 12 Rally. Fields states that he likely read, liked, and retweeted or reposted posts on Twitter and Facebook, and on other social media accounts concerning the August 12 rally, but cannot provide the names of every person who may have read his posts, or the names of every person whose posts he read, liked, and/or reposted or retweeted. The electronic devices which Fields would have used to access his Twitter and social media accounts are presently in the possession of law enforcement. Fields did not knowingly send, receive, or participate in the exchange of any letters, emails, text messages, instant messages, direct messages, telephone conversations, voicemail messages, face-to-face meetings, electronic chats, podcasts, or online videos about the August 12 rally or any other topics with any of

the co-defendants listed in the Amended Complaint. Fields does recall that he “tagged” co-defendant Richard Spencer in some of his Twitter posts. Fields also recalls “tagging” David Duke in some of his Twitter posts. Neither individual ever responded to these “tags.”

Fields also communicated with unknown individuals at the Rally, none of whom he knew, or had communicated with in any way, prior to the Rally. Some of these individuals were wearing white polo shirts with the Vanguard America symbol. He likewise did not know these individuals prior to the Rally and does not have their names or contact information. After the State of Emergency was declared on August 12, Fields walked from McIntire Park back to where his car was parked behind the McDonalds on 5th Street in Charlottesville with three other individuals. Fields gave a ride to these individuals to the places where their vehicles were parked in downtown Charlottesville. Fields did not know these individuals prior to the Rally, but has come to learn that their names are Sarah Bolstad, Hayden Lee Calhoun, and Joshua Matthews.

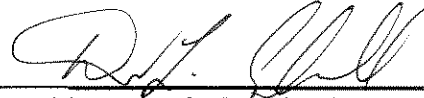
After the rally, Fields communicated with police investigators, counsel, and other personnel at Albemarle Charlottesville Regional Jail.

4. Identify all Electronic Devices used by you to communicate concerning the Events, whether before, during, or after the Events.

ANSWER: Fields states that he used his cellular phone to communicate while he was in Virginia for the Rally. Prior to leaving for the Rally, Fields used his desktop computer to access social media and to read internet posts concerning the Rally.

JAMES ALEX FIELDS, JR.

By Counsel

A handwritten signature in black ink, appearing to read 'D. L. Hauck', is written over a horizontal line.

David L. Hauck, Esquire (VSB# 20565)

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